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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

[REDACTED]

BAJUN DHUNJISHA MAVALWALLA  
II,

[REDACTED]

Defendants.

INDICTMENT

Vio.: 18 U.S.C. § 372  
Conspiracy to Impede or  
Injure Officers  
(Count 1)

18 U.S.C. § 111(a)(1)  
Assault on a Federal Officer  
and Employee  
(Count 2)

18 U.S.C. § 111(a)(1) and (b)  
Assault on a Federal Officer  
and Employee  
(Count 3)

The Grand Jury charges:

COUNT 1

Beginning on a date unknown but no later than June 11, 2025, and  
continuing through June 11, 2025, in the Eastern District of Washington, the

1 Defendants, [REDACTED]  
2 [REDACTED]  
3 [REDACTED], BAJUN DHUNJISHA  
4 MAVALWALLA II, [REDACTED], and other individuals, both  
5 known and unknown to the Grand Jury, did knowingly and intentionally combine,  
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known and unknown to the Grand Jury, did knowingly and intentionally combine,  
conspire, confederate and agree together with each other to prevent, by force,  
intimidation, and threat, an officer of the United States from discharging any duties  
of his office, and to injure an officer in his person and property while engaged in  
and on account of the lawful discharge of the duties of his office, and to injure his  
property in order to molest, interrupt, hinder, and impede him in the discharge of  
his official duties, all in violation of 18 U.S.C. § 372.

Objects of the Conspiracy

18 The objects of the conspiracy included the use of force and threats against,  
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and intimidation of federal agents with United States Immigration and Customs  
Enforcement and Homeland Security Investigations, and the federal agents with  
the Bureau of Alcohol, Tobacco, Firearms, and Explosives, the United States  
Border Patrol, and Spokane Police Department and Spokane County Sheriff's  
Office assisting them, in order to impede and thwart the processing and transport  
of federal detainees to their immigration hearings in Tacoma, Washington, and to  
coerce the release of federal detainees.

Overt Acts of the Conspiracy

In furtherance of the conspiracy and to effect the object thereof, the Defendants and the other known and unknown co-conspirators performed the following overt acts:

1. On or about June 11, 2025, at 12:52 PM, in the Eastern District of Washington, Defendant [REDACTED], posted on social media a call for others to come and join him as he blocked a bus designated to transport all the federal detainees in the facility to Tacoma, Washington for their immigration hearings. Defendant [REDACTED], and other co-conspirators arrived in response to the call and along with [REDACTED] [REDACTED], blocked the pathway and door to the transport bus despite orders to disperse.

2. On or about June 11, 2025, in the Eastern District of Washington, Defendant [REDACTED] intentionally parked his vehicle to block the pathway of the transport bus and preclude its movement. Defendants [REDACTED] [REDACTED] released the air from the tires of the transport bus to preclude its movement. Other co-conspirators painted the windshield of the transport bus rendering it unsafe to operate.

3. On or about June 11, 2025, in the Eastern District of Washington, while federal officers attempted to exit the federal facility through the secure

1 parking lot and vehicle gate located on the south end of the premises, Defendants  
2 [REDACTED]  
3 [REDACTED], BAJUN DHUNJISHA MAVALWALLA II, [REDACTED]  
4 [REDACTED], and other co-conspirators physically blocked the driveway of the  
5 federal facility and/or pushed against the officers, despite orders to disperse and  
6 efforts to remove them from the property. Defendant [REDACTED] struck a  
7 federal officer from behind as the federal officer was attempting to clear the  
8 pathway for transport vehicles to safely exit the facility.  
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12 4. On or about June 11, 2025, in the Eastern District of Washington,  
13 Defendants [REDACTED]  
14 [REDACTED], and other co-conspirators placed trash cans, sand/cement bags,  
15 benches, signs, and other objects in front of the ingresses and egresses to block the  
16 exit of federal officers and detainees from the federal facility.  
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19 5. On or about June 11, 2025, in the Eastern District of Washington,  
20 after the arrival of the Spokane Police Department, Spokane Police Department  
21 placed marked patrol vehicles in front of and behind a red transport van that had  
22 been then designated to transport the federal detainees being held in the facility to  
23 Tacoma, Washington for their immigration hearings. The red van was quickly  
24 surrounded and blocked by [REDACTED]  
25 [REDACTED], and other co-  
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1 conspirators. [REDACTED] armed with a boxcutter, slashed the  
2 tires of the red transport van rendering it unsafe to operate.  
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4 6. On or about June 11, 2025, in the Eastern District of Washington,  
5 Defendant [REDACTED] threw a deployed incendiary device in the  
6 direction of Spokane Police Department and Spokane County Sheriff's Office  
7 deputies.  
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9 7. On or about June 11, 2025, in the Eastern District of Washington,  
10 Defendant [REDACTED] posted on social media a call for others to  
11 come and join noting the intent was to "risk arrest to block the exits to ICE."  
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14 8. Multiple calls for assistance were made to local law enforcement  
15 agencies. Federal agents, civilian employees, and the detainees were unable to  
16 leave the facility as a result of the actions of [REDACTED]  
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18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 [REDACTED], BAJUN DHUNJISHA MAVALWALLA II, [REDACTED],  
22 and other co-conspirators, until approximately 9:00 PM, and only with the  
23 assistance of the Spokane Police Department S.W.A.T. team.  
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25 The overt acts detailed in the allegations of Counts 2 and 3 of this  
26 Indictment are hereby realleged as if fully set forth herein and incorporated by  
27 reference. All in violation of 18 U.S.C. § 372.  
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COUNT 2

On or about June 11, 2025, in the Eastern District of Washington, the Defendant, [REDACTED] did forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, who was engaged in and on account of the performance of official duties, and such acts involved physical contact with the victim and involved the intent to cause another felony, to wit: a violation of 18 U.S.C. § 372. All in violation of 18 U.S.C. § 111(a)(1).

COUNT 3

On or about June 11, 2025, in the Eastern District of Washington, the Defendant, [REDACTED] did forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, who was engaged in and on account of the performance of official duties, and such acts involved the intent to cause another felony, to wit: a violation of 18 U.S.C. § 372, and did use a dangerous weapon to forcibly assault, resist, oppose, impede, intimidate, and interfere with a federal officer and federal employee and a person assisting such an officer and employee, as designated in 18 U.S.C. § 1114, while  
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1 engaged in and on account of the performance of official duties. All in violation of  
2 18 U.S.C. § 111(a)(1) and (b).  
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4 DATED this \_\_\_\_ day of July 2025.

5 A TRUE BILL  
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9 Foreperson  
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13 Stephanie Van Marter  
14 Acting United States Attorney  
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17 Lisa C. Cartier Giroux  
18 Assistant United States Attorney  
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